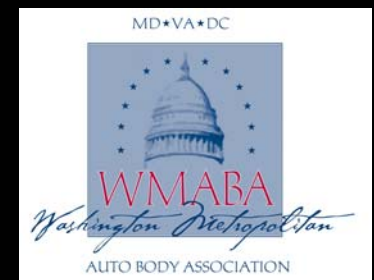


# The Virginia Auto Body Shop Voluntary Self-Certification Program



October / November  
2007



# Logistics & Administration

- Restrooms
- Cell Phones
- Sign – In Sheet
- Evaluation Sheet
- Workbooks

# The Virginia Auto Body Shop Self-Certification Program

## **Tonight's Program**

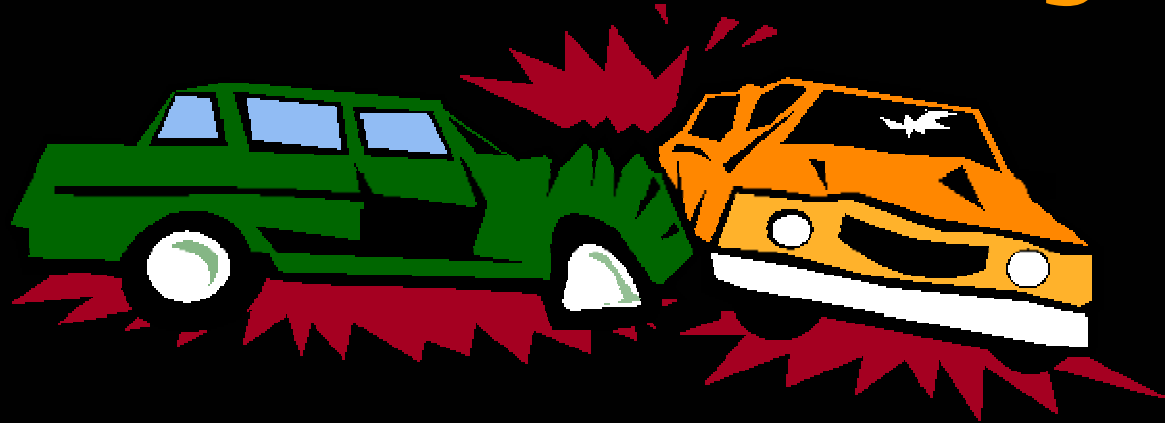
- Introductions
- Introduction to the Virginia Auto Body Shop Self-Certification Program
- How to Use the Program Workbook, and the Self-Certification Package
- Tools to utilize

## **Break**

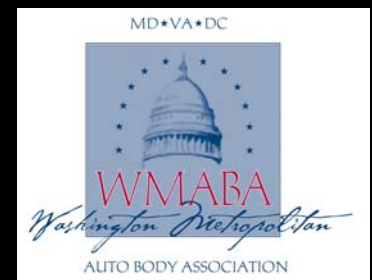
- Environmental Awareness for Air, Waste, and Water
- EPA's Proposed New Rule for Auto Body Shops
- Wrap-Up

*Please Interrupt*  
*! Ask Your Questions At Any Time !*

# The Virginia Auto Body Shop Voluntary Self-Certification Program



October / November  
2007



SMITH AUTOMOTIVE

Okay, Mr. Smith.

Drop the spray gun  
and come out with  
your hands up.

DEQ

DEQ

# Have you Registered?

- Auto Body Shops – Vehicle Refinishers in Northern Virginia became subject to the Virginia Air Regulations in 2004.
  - It requires that you Register your Shop with DEQ.
  - If you have not done so you must do so immediately. Absolutely no later than January 31, 2008.

# What is the Auto Body Shop Self-Certification Program?

- It is a program that will help you, the owner, or operator of an auto body shops, understand and comply with the environmental requirements which impact your operation on a daily basis.
- It has been designed to be self-directed by you at your own pace and is hopefully easy to understand.
- YOUR PARTICIPATION is VOLUNTARY !!!



# The Self-Certification Program

- Workshops to explain the program
- A workbook that contains all the environmental information an auto body shop needs to know
  - Front Pocket - Pre-Addressed Envelope
  - Registration Form – **Found in the Introduction** – It is **Mandatory if not already submitted**
  - Participation / Non-Participation Form – found in the Instructions
- Self-certification Package
  - ❖ Self-Certification Checklist
  - ❖ Self-Certification Statement and
  - ❖ the Return-to-Compliance Form

# The Self-Certification Program

- Information on *Best Management Practices* and *Do's and Don't's* to reduce your environmental liability
- TIPS to improve your shop and **save you money** through pollution prevention and energy conservation
- **INCENTIVES -- WINFM**

# Incentives for participating in the Auto Body Shop Self-Certification Program

- Better understanding of your Environmental Requirements
- Improves your environmental performance and protects your workers and their health
- Prepares you for an inspection by helping you achieve compliance with regulations
- Saves you \$\$ money \$\$ by generating less waste, using less product and less energy

# Incentives

- Certification removes you from scheduled inspections.
- You will be recognized publicly by the DEQ as an environmentally compliant participant in the “DEQ Auto Body Shop Self-Certification Program.”
- You will get a certificate for your wall and a decal to put on your door.

**2008**  
**SELF-CERTIFIED**



**AUTO BODY SHOP**



# Incentives

- EPA's Design for the Environment will provide a follow-up workshop and/or individual on-site Pollution Prevention and Operational Efficiency analysis for participants, if they are interested.
- We also hope to be able to provide Training Opportunities in innovative spray technologies for you and your employees.

# Workbook Overview

# Workbook Overview

Although the workbook looks long –

- It is divided into sections
- There are sections within sections

**DO NOT TRY TO READ THE ENTIRE  
WORKBOOK AT ONE SITTING !**





# Workbook Overview

- You may find that you are familiar with an area and may not need to read that particular section. You may find that certain sections do not apply to your shop.
- The Primary Sections of the Workbook are:  
Best Practices, Air, Hazardous Waste,  
Universal Waste and Used Oil, Solid Waste,  
and Water Pollution  
  
All are cross referenced to the Self-Certification  
Checklist and its sections.

# Workbook Overview

Each chapter can be read separately in any order you choose - at your own pace.

It is a good idea to have the self-certification checklist handy as you read the workbook. That way you can fill out the self-certification questions as you read the relevant parts of the workbook.

# How do I participate?

- Read the workbook – It is arranged to follow the Checklist
- Complete the self-certification checklist to include the self-certification statement
- Complete the return-to-compliance form, if needed
- Submit the self-certification checklist, the signed self-certification statement, the return-to-compliance forms (if needed).
- We would like to have the Certification Packages completed by January 31, 2008, or as soon as possible thereafter.

# Participating in the Auto Body Shop Self-Certification Program is Voluntary

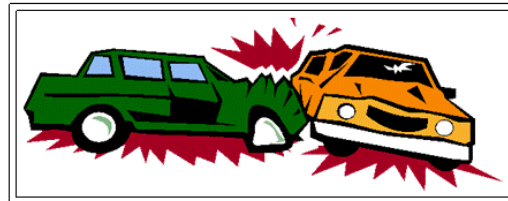
Complying with environmental laws is  
mandatory !!!

If You have not registered, then you  
must return the Registration Form within  
30 days of receiving it but no later than  
January 31, 2008. Submit the form to  
the DEQ Northern Office

# The Workbook

Certification Year 2008

Compliance Assistance Workbook  
for the  
Northern Virginia  
Auto Body Shop Self-Certification Program



Virginia Department of Environmental Quality  
Northern Regional Office  
13901 Crown Court  
Woodbridge, VA 22193-1453  
<http://www.deq.virginia.gov/osba/nvaautobody.html>



# Registration Process

- All “mobile equipment repair and refinishing operations” in Northern Virginia are **Required to register**.
- Applies to all who apply pretreatments, primers, top coats, and other coatings to mobile equipment, including parts and coat an area larger than a 1” diameter circle.
- Mobile equipment: autos, trucks, buses, motorcycles, trailers, campers, construction and farm equipment, golf carts, airport ground support equipment, etc.
- Registration form is in **the Instructions** of your binder.

**IF YOU HAVE NOT REGISTERED SEE US AFTER THE WORKSHOP !**

# Instruction Section

Registration form asks for:

- General information, type of business, services provided.
- Average weekly number of body shop jobs.
- List paints booths and any air pollution controls present.
- Certification by responsible company official.



# Instruction Section

Registration Form is Due to the DEQ  
Northern Regional Office Immediately

- NLT January 31, 2008.

DEQ will provide shop with a registration  
number (example: 72345)

- Registration number should be used on  
any subsequent correspondence with  
DEQ.

# Table of Contents

## Northern Virginia Auto Body Compliance Assistance Workbook

### Primary Workbook Sections

Section 1: Best Practices

Section 2: Air Pollution

Section 3: Hazardous Waste

Section 4: Universal Waste and Used Oil

Section 5: Solid Waste

Section 6: Water Pollution

# Table of Contents

## Workbook Appendices:

1. Estimating Your Shop's Air Emissions and Determining Your Shop's Air Emission Status
2. Hazardous Waste Identification Assistance Table
3. Hazardous Waste Identification Worksheet
4. Hazardous Waste Accumulation Area Weekly Inspection Checklist
5. Uniform Hazardous Waste Manifest
6. Sample Letters to Local Authorities
7. Hazardous Waste Emergency List
8. Sample Emergency Preparedness Tools
9. Sample Emergency Plan
10. Land Disposal Restriction Form
11. List of Recyclers for Fluorescent Lamps and Ballasts
12. Recycling Used Oil
13. Small Business Environmental Compliance Assistance Fund
14. Online Resources

# Table of Contents

## Self-Certification Package:

- Certification Instructions
- Checklist
- Certification Statement
- Return-to-Compliance Form

# Self-Certification

- Voluntary program
- Participation incentives--DEQ recognition decal; reduced inspection frequency
- Self-Certification Packet at the back of the binder
- Packet contains questions about air, water, and waste issues
- Questions in bold marked “req.” address things required by the regulations
- Other questions address “best management practices” (BMPs) and other tips that are good ideas to help you comply with regulations, improve performance, and save you money.

# Self-Certification (continued)

- Required questions are in **bold** – they indicate an environmental requirement which requires compliance.
- Your answers should represent current conditions in your shop – not future plans.
- If your answers to required questions indicate out-of-compliance, you are ***strongly encouraged*** to make corrections before completing and submitting your self-certification package.
- If you can't make corrections prior to submittal then you should complete the "Return-to-Compliance Plan Form."
  - Last form in the Self-Certification Package.
  - Fill out a form section for each out-of-compliance question.

# Self-Certification (continued)

- The Workbook is designed to help you:
  - Complete the Self-Certification Package.
  - Meet your requirements under regulations.
  - Achieve BMPs to help your business' compliance, performance, and save money.

Example from air section - Section 2 of Workbook and Self-Certification Checklist

# Example: Product data sheet

## Primer-surfacer meets 4.8 lbs/gal VOC standard



**HBC Prime  
WP300**

### PRODUCT DESCRIPTION:

HBC PRIME™ is a premium, acrylic based lacquer primer-surfacer designed for faster fill and less shrinkage than conventional lacquer primer-surfacers. HBC PRIME™ dries to sand in as little as 15-20 minutes and powders easily with no clogging of the sandpaper. HBC PRIME™ has excellent filling, feathered edges easily, and since it is acrylic based, is more resistant to blisters caused by high humidity. WP300 when used with WR350 reducer has a ready to spray VOC of 4.8 lbs/gal for VOC regulated areas.

### TECHNICAL DATA:

• Color	Gray	• Air Pressure	40-45 psi
• Flash Points	45°F TOF	• Viscosity #4 Ford	15-17 sec
• VOC – as packaged	4.45 lbs/gal	• Lead/Chromate Free	Yes
• VOC – ready to spray with WR350	4.8 lbs/gal		

### SURFACE PREPARATION:

Bare Substrates: Steel, properly treated Galvanized Steel\*, Aluminum, or Fiberglass

\*Note: With the inconsistencies of galvanized steel, consult your local Western Representative for system recommendations and substrate testing.

1. Solvent clean with Grease and Wax Remover WS1018 or Low VOC Surface Cleaner WS1019 and wipe dry with a clean, dry cloth.
2. Apply 2-3 medium coats of Primary Prime™ Etching Filler WP370 or WP375.

Prepainted Substrates:

1. Wash surfaces with a mild detergent in hot water. Rinse well and wipe dry with a clean, dry cloth.
2. Solvent clean surfaces with Grease and Wax Remover WS1018 or Low VOC Surface Cleaner WS1019. Wipe dry with a clean, dry cloth.
3. Grind off paint and remove all rust as needed. Fill as needed using an appropriate body filler. Allow body filler to tack up and shape as needed. Body filler must be cured before coating.
4. Sand repair area and feather edge using 80, 180, 280, and finish with 320 grit treated sandpaper on a random orbital sander.
5. Apply 2-3 medium coats of Primary Prime™ WP370 or WP375 to bare metal and body filler.

**P  
R  
O  
D  
U  
C  
T**



# Example: Product data sheet

Primer-sealer does not meet 4.6 lbs/gal VOC standard

## **QUICK-SEAL® Primer-Sealer**

8093 Gray/8097 Red Oxide/8098 Gray

QUICK-SEAL® Primer Sealer is a quick drying enamel sealer designed to be applied over bare metal or prepainted substrates. QUICK-SEAL® provides good topcoat gloss holdout, adhesion to properly prepared bare metal or prepainted substrates, good corrosion resistance over steel, and fills minor surface scratches. It can also be used as a shop coat primer to protect vehicles or parts from the elements upon outside storage.

VOC as applied 8093/8098 . . . . . 5.21 lbs/gal or 624 gms/ltr

VOC as applied 8097 . . . . . 5.74 lbs/gallon or 688 gms/ltr

Tools

**BREAK**

# Air Pollution in your Auto Body Shop

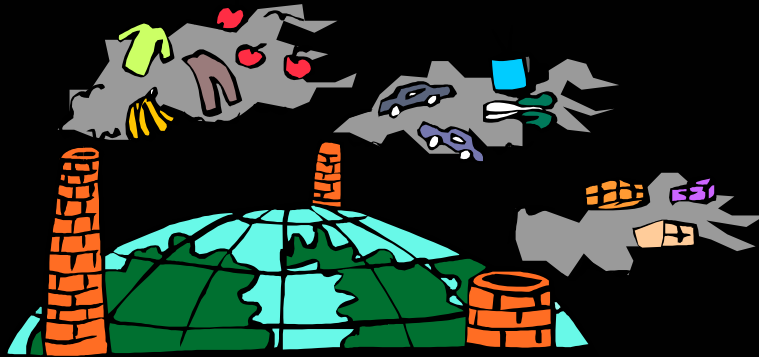
Terry Darton  
Regional Air Permit Manager  
(703) 583-3845  
[thdarton@deq.virginia.gov](mailto:thdarton@deq.virginia.gov)

# Presentation Outline

- Pollutants generated from auto body shops
- Air requirements for auto body shops

# Pollutants Generated

- Four primary activities
  - Surface preparation
  - Surface coating
  - Cleanup
  - Air conditioner repair
- Four main air pollutants
  - Volatile Organic Compounds (VOCs)
  - Hazardous Air Pollutants (HAPs)
  - Dust (Particulates)
  - Chlorofluorocarbons (CFCs/HFCs)



# Volatile Organic Compounds

- Paints, surface preparation solutions, solvents
- All VOCs are emitted
- Possible Results
  - Smog
  - Increased asthma sensitivity
  - Damage lung tissue
  - Causes various respiratory illnesses
  - Cause damage to crops



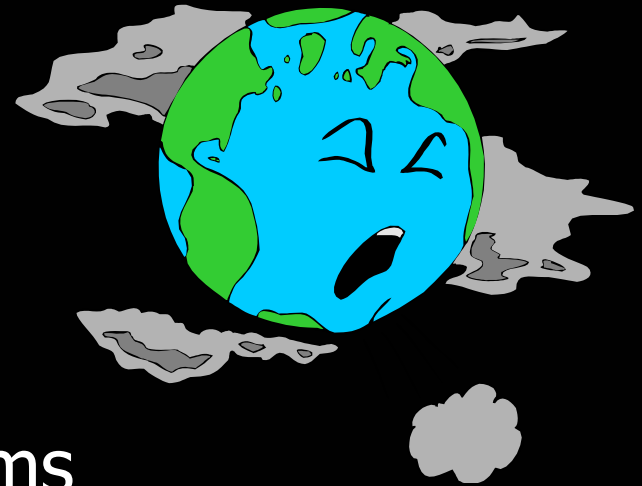
# Hazardous Air Pollutants

- Paints, surface preparation solutions, solvents
- Many HAPs are also VOCs
- Harmful to health
  - May cause cancer
  - May cause birth defects
  - May contribute to other health problems



# Dust (Particulates)

- Sanding activities and over-spray from painting
- Dust contains toxic metals
- Harmful to health
  - Build up in tissue
  - Aggravate respiratory problems



# Chlorofluorocarbons (CFCs/HFCs)

- Vehicle air conditioners
- Destroy Ozone Layer
- Increased UV Exposure
  - Increased risk of skin cancer
  - Damage to DNA in humans, plants and animals



# Northern Virginia Volatile Organic Compound Emissions Control Area

The Air Requirements apply to the following:

- Cities

Alexandria City, Fairfax City, Falls Church City, Manassas City, Manassas Park City,

- Counties

Arlington County, Fairfax County, Loudoun County, Prince William County, Stafford County

# Virginia Air Regulations

- PRIMARY Regulatory Requirements
  - Register your Shop – you will receive a Registration Number from DEQ, example 71234
  - USE VOC Compliant Paints
  - Reduce fumes and dust from coating and storage
  - Spray Gun Cleaning

# Allowable Content of VOCs in Paints & Coatings (as applied) Weight of VOCs per Volume of Coating (minus water & non-VOC solvents)

<u>Coating Type</u>	<u>Pounds/Gal.</u>	<u>Grams/Liter</u>
Automotive pretreatment primer	6.5	780
Automotive prime-surfacer	4.8	575
Automotive primer-sealer	4.6	550
Automotive topcoat:		
single stage-topcoat	5.0	600
2 stagebasecoat/clearcoat	5.0	600
3 or 4 stage basecoat/clearcoat	5.2	625
Automotive Multi-colored Topcoat	5.7	680
Automotive Specialty	7.0	840

# Air Regulation Requirements

## [9 VAC 5-40 Article 48]

Use only the following coating application techniques:

- Any non-atomized application technique
- High Volume Low Pressure (HVLP) spraying
- Electrostatic spray
- Airless spray
- Other coating application methods that achieve emission reductions equivalent to or greater than those achieved by HVLP or electrostatic spray application methods. DEQ must approve.

# REQUIREMENTS FOR REDUCING FUMES FROM PAINTS AND SOLVENTS

Take these measures to minimize fumes generated from use of paints & solvents.

- Store fresh and used coatings, thinners, and solvents in closed containers.
- Keep containers for fresh and used coatings, thinners, and solvents closed except when filling or emptying.
- Store cloth and paper, or other absorbent applicators, moistened with coatings, solvents, or cleaning solvents in appropriate containers.
- Mix paints only according to manufacturers' instructions.
- If you use cold solvent cleaners, only purchase solvents with a vapor pressure of 1 mmHg at 68°F.
- Only purchase coatings that comply with VOC content limits found in the Table found on page 2-6 of your notebook.

# Air Regulation Requirements

[9 VAC 5-40 Article 48]

## Application Techniques Exempt from regulatory requirements:

- Airbrush application methods for graphics, stenciling, lettering, and other identification markings.
- An application of coatings sold in non-refillable aerosol containers; and
- Application of automotive touch-up repair finishes materials.



# REQUIREMENTS FOR CLEANING SPRAY GUNS AND EQUIPMENT

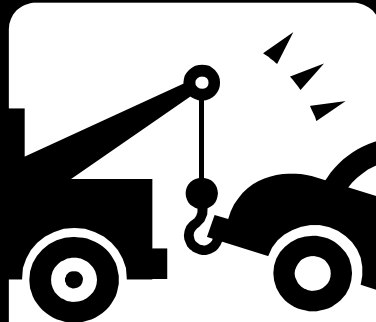
Use only the following methods to clean spray guns:

- An enclosed spray gun cleaning system that is kept closed when not in use.
- An unatomized discharge of solvent into a paint waste container that is kept closed when not in use.
- Disassembly of the spray gun and cleaning in a vat that is kept closed when not in use.
- Atomized spray into a paint waste container that is fitted with a device designed to capture atomized solvent emissions.

Your coatings and spray gun vendors may be able to provide advice and suggestions.

# Major Source Air Permitting Requirements

- If your shop can conduct more than 50 jobs per week, contact DEQ's NRO Air Permit Manager at (703) 583-3845



# REQUIREMENTS FOR SERVICING, REPAIRING AND REPLACING VEHICLE AIR CONDITIONING SYSTEM

- Make sure your employees who handle refrigerants have been trained and certified by an EPA-accredited program. For a list of approved certification organizations call the EPA Stratospheric Ozone Hotline at 1-800-296-1996.
- Allow only EPA-certified technicians to remove refrigerants.
- Use only your EPA-certified technician to purchase refrigerants, unless your shop is an EPA authorized reclaiming facility.
- Recycle refrigerants for reuse on-site or send recovered refrigerant to an EPA-approved reclaimer.
- Use only EPA-approved/certified recycling/recovery equipment, and label the equipment properly. For a list of EPA approved/certified equipment call the Ozone Hotline.
- Keep a copy of the EPA certification of your equipment and your EPA certification to operate recovery and recycling devices.
- Maintain records of off-site reclamation, including volume and final destination.
- Keep all records of refrigerant purchase, sales, on-site recycling, and reclamation for three years.

# Questions





# Solid & Hazardous Waste



# Presentation Outline

## Solid Waste

- Definition
- Requirements for disposing solid waste

## Hazardous Waste

- Definition and categories of waste
- Typical wastes generated by auto body shops
- Categories of hazardous waste generators and their requirements
- Proper container management
- Auto body shop practices – Do's and Don'ts

# What is a Solid Waste?

- Any material that is no longer used, by either being thrown away, recycled or stored
- Can be a solid, a liquid or a containerized gas
- Hazardous waste is a subset of solid waste





# Requirements for Disposing Solid Waste

## Do:

- Dispose of hazardous waste separately from solid waste
- Use municipally provided solid waste pickup/disposal services or hire a licensed/permitted contractor to pick up and dispose of solid waste
- Contact the **DEQ's Alan Lassiter** at **(804) 698-4215**, if you store 100 or more used tires at any one time. If you store that many tires, you are subject to tire handling and storage regulations and need a permit.

# REQUIREMENTS FOR DISPOSING OF SOLID WASTE

## Don't:

- Mix solid waste with hazardous waste
- Burn your solid waste
- Dispose of your solid waste on your property
- Dispose of fluorescent bulbs, mercury thermostats, lead-acid batteries, electronics, used oil, or antifreeze as solid waste. They are universal wastes that can be recycled if handled appropriately.

# Dumpster Diving Team



DUMPSTER  
DIVING TEAM

DUMPSTER  
DIVING TEAM

# Questions



# Understanding Virginia's Requirements for the Proper Management of Hazardous Waste



# What Is A Hazardous Waste ?

- A hazardous waste is a waste with properties that make it dangerous or capable of having a harmful effect on human health or the environment
- Waste is material that is no longer used, by either being thrown away, recycled or stored
- Can be a solid, liquid or containerized gas
- Your typical wastes can be found in the Hazardous Waste Table in the appendices



# Regulated Hazardous Wastes

- Characteristic Hazardous Waste

Waste that is considered hazardous if it exhibits any of the following characteristics

- Ignitability
- Corrosivity
- Reactivity
- Toxicity



- Listed Hazardous Waste

– Included in specific list of chemicals in the federal regulations - can be found in the Federal Register

# Characteristic Hazardous Waste



Ignitable (**D001**) - has a flash point less than 140° F (60° C)



Corrosive (**D002**) - has a pH of  $< 2.0$  or  $> 12.5$



Reactive (**D003**) - can catch fire, explode or gives off dangerous fumes when mixed with water or other materials



Toxicity - (**D0\_\_**) - fails TCLP test



# Listed Hazardous Waste

- Listed due to one of the four characteristics or contain toxic constituents that are harmful to human health & the environment
- Include:
  - - **F** Listed Waste
  - - **K** Listed Waste
  - - **P** Listed Waste
  - - **U** Listed Waste



# Typical Hazardous Wastes Created by an Auto Body Shop

- Paints with thinners or reducers  
(D001 or F-listed Waste)
- Paint booth filters  
if contaminated  
with metal based paint  
(Toxicity, F Waste)
- Sludges or solid cakes leftover from the still process  
or left in the bottom of the waste paint / thinner  
drum (aka Still bottoms)  
(D001, Toxicity, F Waste)
- Used rags or paper towels containing  
combustible solvents (D001, F Waste)



# Typical Hazardous Wastes Created by an Auto Body Shop

- Waste parts washer solvents (D001)
- Rust removers (D003)
- Paints and solvents from building maintenance (D001, F waste)
- Aerosol cans (D001, D002, F waste)
- Gasoline tanks (D001)
- Sand Blast Grit from blasting old cars where paints may contain Heavy Metals (Lead, Chromium, Cadmium)



# What Should You Count as Hazardous Waste

- Waste paint / paint solvent – **YES**
- Empty aerosol cans - **YES**
- Waste parts washer solvent - **YES**
- Still bottom's - **MAYBE**
- Floor cleaning waste water - **MAYBE**
- Shop towels - **MAYBE**
- Sump sludges - **MAYBE**
- Paint spray booth filters - **MAYBE**

# What Not to Count as Hazardous Waste

## Universal Waste

- Fluorescent Light Bulbs
- Batteries
- Pesticides

## Other Products

- Antifreeze
- Used Oil



Universal wastes are not considered to be hazardous wastes if they are properly managed and disposed. Follow the requirements in the workbook to determine how to handle universal wastes.

# Categories of Hazardous Waste Generators

- Conditionally Exempt Small Quantity Generator
- Small Quantity Generator
- Large Quantity Generator

Categories are based upon

- the amount of waste that is generated per calendar month
- the total amount of hazardous waste accumulated at the entire facility at one time

# Identifying Generator Status

## *Conditionally Exempt Small Quantity Generator (CESQG)*

- Generates no more than 220 pounds (or about 25 gallons) of hazardous waste in any calendar month
- Never accumulates more than 2,200 pounds (or about 300 gallons) on site at any one time

# Identifying Generator Status (cont.)

## *Small Quantity Generator (SQG)*

- Generates more than 220 pounds and less than 2,200 pounds (or about 25 gallons to under 300 gallons) of hazardous waste in any calendar month.
- Never accumulates more than 13,200 pounds (or about 1,600 gallons) on site at any one time



# Identifying Generator Status (cont.)

## *Large Quantity Generator (LQG)*

- Generates more than 2,200 pounds (or 300 gallons) in any calendar month.



# CESQG Requirements

- Identify all hazardous wastes generated
- These wastes must be disposed of at a permitted hazardous waste treatment, storage, or disposal facility (TSDF)
- Never accumulate more than 2,200 pounds (300 gallons) of hazardous waste on site at any one time

# CESQG Requirements (cont.)

- Retain a copy of the manifest, bill of lading, receipt, etc. for each hazardous waste shipment
- Label all hazardous waste containers with the words “**HAZARDOUS WASTE**” or with their contents (eg. “**WASTE SOLVENTS**”)
- Perform proper container management

# SQG Requirements

- Obtain an EPA ID Number
- Identify and count generated waste
- Label all hazardous waste containers with the words **“HAZARDOUS WASTE”**
- Mark the container with the date that it becomes full
- Do not store the container past 180 days after the container is full
- Maintain adequate aisle space between the containers for inspections
- Never accumulate more than the 13,200 pound (1,600 gallons) limit

# SQG Requirements (cont.)

- Retain test results, manifests, receipts, or bills of lading for three (3) years
- Retain land ban forms for three (3) years
- Train personnel in the proper handling of hazardous wastes
- Perform weekly inspections of the accumulation area
- Have an emergency plan which includes posting emergency telephone numbers and fire extinguisher locations
- Keep a fire extinguisher by the accumulation area in case of emergency
- Notify DEQ that you have a waste accumulation area and where it is located.

# LQG Requirements

- If you generate more than 2,200 pounds (or 300 gallons) in any calendar month, you will be considered a large quantity generator and will be required to pay additional fees to the DEQ for this status.
- Do not exceed the 90 day storage limit.
- Call the Waste Program at the DEQ Northern Regional Office for more information regarding the requirements of this category

# EPA Identification Numbers

- If you generate more than 25 gallons (220 pounds or 100 kg) in any calendar month, you need a permanent EPA ID Number. To receive an EPA ID Number (No Fee Involved) call Dan Gwinner with DEQ's Waste Program at **(804) 698-4218**.
- Example EPA ID No.: VAD 123456789

# Hazardous Waste Haulers

- To transport hazardous waste in Virginia, the hauler must have a Virginia Hazardous Waste Transporter Permit. Before choosing a hauler, check with the following sources:
  - Business colleagues
  - Trade associations
  - Better Business Bureau
  - Virginia DEQ Waste Program



# Proper Container Management

- Sturdy, leak proof, sealed, and labeled.
- Keep containers closed (except to add or subtract). This includes funnels attached to paint waste containers.
- Store indoors - if possible. If not, keep the containers in a secure area.
- Keep appropriate absorbent material in stock and nearby in case of spill

# Improper Container Management



Can you identify the problems with these two pictures?

# Proper Container Management



# Labeling

**HAZARDOUS  
WASTE**

FEDERAL LAW PROHIBITS IMPROPER DISPOSAL  
IF FOUND CONTACT THE NEAREST POLICE OR PUBLIC SAFETY  
AUTHORITY OR THE U.S. ENVIRONMENTAL PROTECTION AGENCY

GENERATOR INFORMATION:  
NAME \_\_\_\_\_  
ADDRESS \_\_\_\_\_ PHONE \_\_\_\_\_  
CITY \_\_\_\_\_ STATE \_\_\_\_\_ ZIP \_\_\_\_\_  
EPA / MANIFEST  
ID NO. / DOCUMENT NO. \_\_\_\_\_  
ACCUMULATION  
START DATE \_\_\_\_\_ EPA  
WASTE NO. \_\_\_\_\_

[ \_\_\_\_\_ ]  
[ \_\_\_\_\_ ]  
[ \_\_\_\_\_ ]  
D.O.T. PROPER SHIPPING NAME AND UN OR NA NO. WITH PREFIX

**HANDLE WITH CARE!**

S-309, ULINE, 1-800-295-5510



# TOOLS TO HELP





# TOOLS TO HELP



# Paint Spray Booth Filters (Do's)

- **Do** change filters according the manufacturer's specifications
- **Do** install filters properly and be sure to cover all openings
- **Do** make a hazardous waste determination by testing or using generator knowledge (MSDS)
- **Do** manifest the filters when sending them offsite as a hazardous waste if they are hazardous
- **Do** if non-hazardous, dispose of filters as municipal solid waste (trash)

# Waste Paint & Paint Solvents

## (Do's)

- **Do** place waste paint solvent in labeled containers
- **Do** make sure solvent is too dirty to use anymore before placing it in the waste drum
- **Do** use a spray gun cleaning unit
- **Do** use a distillation unit (Still)
- **Do** keep your containers closed



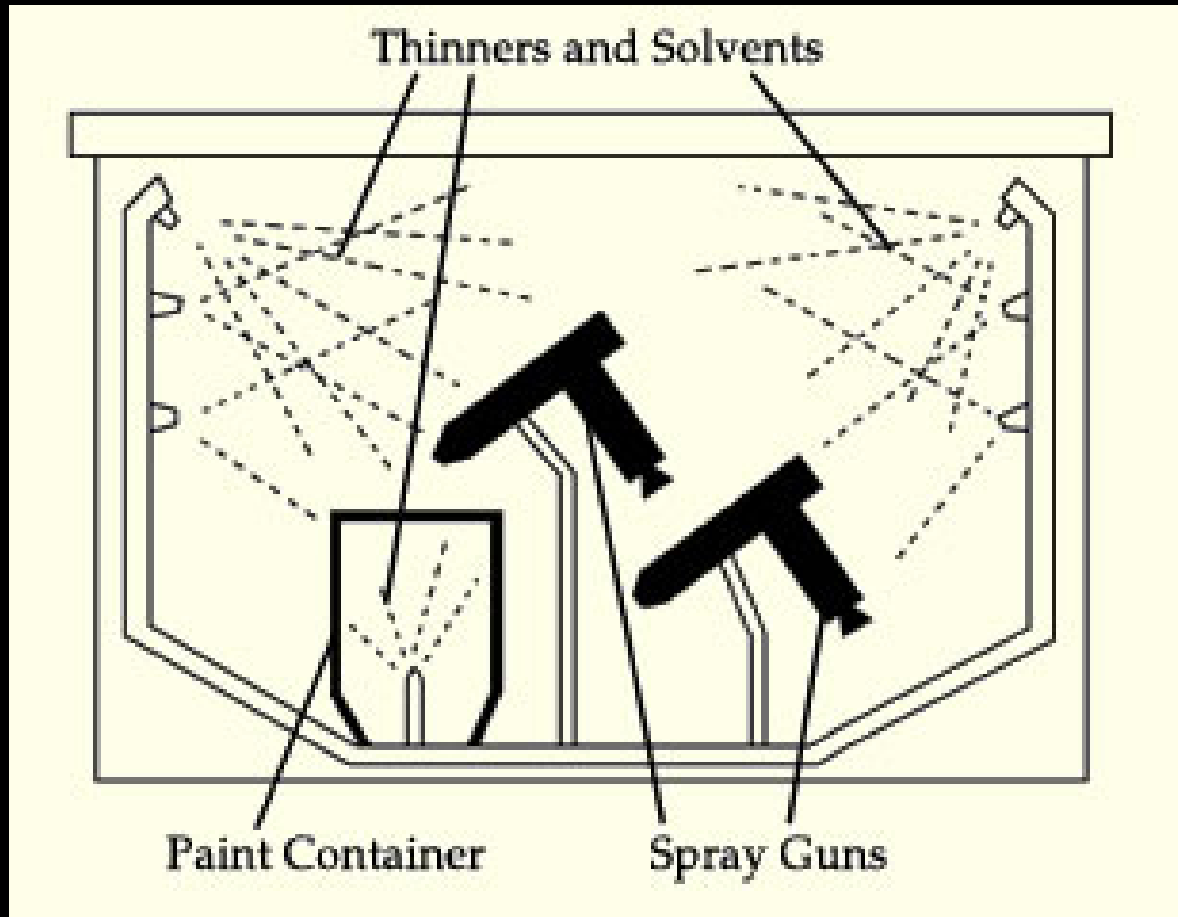
# DISTILLATION



# PAINT GUN CLEANING



# PAINT GUN CLEANING



# Waste Paint & Paint Solvent (Don'ts)

- **Don't** dispose of waste to drains, vent to the air or dump on the ground
- **Don't** mix paint and paint solvents with other wastes
- **Don't** evaporate solvents as a means of disposal
- **Don't** place still bottoms or “pucks” in a municipal solid waste (trash) dumpster
- **Don't** give excess paint to customers as touch-up paint
- **Don't** leave containers open or unlabeled

# Hazardous Waste Questions



# Contact Information

## **DEQ - NRO Waste Program**

Program Manager - Richard Doucette

[rcdoucette@deq.virginia.gov](mailto:rcdoucette@deq.virginia.gov)

(703) 583-3813

**Hazardous Waste Inspector**

Maria Raney

**Solid Waste Inspector**

Joe Trocchio

# Understanding Virginia's Requirements for the Proper Management of Universal Waste and Other Products

## Universal Waste

- Fluorescent Light Tubes
- Batteries
- Pesticides

## Other Products

- Used Oil
- Anti-freeze

Can all be handled as “Universal Wastes” which  
simple means using the proper techniques to  
RECYCLE. See Section 4 in the Workbook.





# Industrial Wastewater at your Auto Body Shop Facility

# There are two (2) primary types of wastewater:

- Industrial waste water
- Domestic (or sanitary) wastewater



# Industrial Wastewater

- *Industrial wastewater* means all wastewater contaminated with materials from auto body shop operations. If dangerous materials like paint, solvents, sanding dust, antifreeze, oil, or auto fluids get into your shop's wastewater, it is industrial wastewater.
- In this workbook, industrial wastewater also includes water from wet sanding, water from washing auto body tools and equipment, work area washing, or car washing.
- Section 5 explains the requirements you must follow under Virginia law if you generate industrial wastewater. This section also gives tips for conserving water and preventing pollution, while saving you money.

# Some contaminants generated by auto body repair that result in industrial wastewater are:

- Paints and paint residue, solvents, thinners, strippers, degreasers and parts washers;
- Gasoline, motor oil, and auto fluids leaked from cars waiting to be repaired; and
- Sanding dust or residue from wet sanding

*(note that this is not an all-inclusive list)*

# Where is your industrial wastewater authorized to go?

- Public sewer system

OR

- On-Site wastewater treatment and disposal (septic) system, with an approved oil/water separator

(see 'On-Site Regulations' for more information about what is authorized for septic systems)

# *Know where your wastewater goes.*

- Does your wastewater go to public sewer or a septic system?
- Does your shop have a floor drain?
- What shouldn't be flushed down the drain?



The EPA has designated *motor vehicle disposal wells* (floor drains) as a high priority.

Contact the US EPA Underground Injection Control Program (UIC) at (304) 234-0286 to schedule an inspection to make sure your drain is properly closed.

All floor drains in areas that involve auto repair are to be properly abandoned or connected to an approved oil/water separator.

# What should you do about your floor drains?

Refer to the workbook for the following:

- Requirements for closing a floor drain  
and
- Requirements for using existing floor drain



# Public Sewer System

- Sewer systems may receive both sanitary and industrial wastewater from auto body shops. If your shop's drains connect to a public sewer system, you must meet the following requirements:
- You must make sure that the hook-up of your drains to the sewer is legal and that you have a wastewater discharge permit, pretreatment permit, and/or other proper documentation allowing your shop to discharge to the local sewer.

# Septic Tanks

- Septic tanks are primarily designed to handle sanitary wastewater from sinks, showers, and toilets in your shop — not materials from your auto body work.
- If your shop is located outside the public sewer system, you may be prohibited from discharging industrial wastewater to your septic tank.
- You must make sure that your septic system is constructed, operated and maintained so that it does not pollute groundwater.

# Preventing Water Pollution

The best ways to prevent water pollution and money from going down the drain are:

- use less water and
- keep your wastewater clean and free of contaminants from your auto body work.
- The workbook contains some simple steps that your shop can take to prevent water pollution and, in some cases, save money.



# Questions



# Contact Information

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# EPA's New Surface Coating Regulations

Part 63 Subpart HHHHHH

National Emission Standards for Paint Stripping &  
Miscellaneous Surface Coating Operations at Area  
Sources

§63.11170 - Am I subject to this subpart?

Yes, if you spray, roll or brush coatings or if you use  
a paint stripper containing Methylene Chloride  
(MeCl).

# EPA's New Surface Coating Regulations

§63.11171 What operations does this subpart cover?

- Engaged in these activities:
  - paint stripping w/ a stripper that contains MeCl
  - surface coating of misc. metal and plastic parts and/or products
  - finishing and refinishing of motor vehicles and mobile equipment



# EPA's New Surface Coating Regulations

## Surface Coating Operations:

What types of shop operations are  
Affected?

# EPA's New Surface Coating Regulations

## Operations Affected

- Mixing rooms and equipment;
- Spray booths, ventilated prep stations, curing ovens, and associated equipment
- Spray guns & associated equipment;
- Spray gun cleaning equipment;
- Equipment used for storage, handling, recovery, or recycling of cleaning solvent or waste paint; and
- Equipment used for paint stripping

# EPA's New Surface Coating Regulations

§63.11173 What are my general requirements?

Miscellaneous Surface Coating requirements  
THIS MEANS YOU:

# EPA's New Surface Coating Regulations

## What do you have to do?

- All painters and employees handling paint must have completed training (16 hours required)
- Must be Certified or else can't spray.
- Must be recertified every 5 years

# EPA's New Surface Coating Regulations

## What About your Booth – What is Required?

- All spray-applied coating must be applied in a booth or prep station meeting these requirements:
  - polyester fiber or fiberglass particle filters else proven to capture 98% of spray (ASTM 52.1)
  - booths & prep stations for complete motor vehicles or mobile equipment must be fully enclosed with negative pressure
  - booths & prep stations for miscellaneous parts and/or products (all others) must have a roof & 3 sides with ventilation that causes air to be drawn in and exhausted through a vent with a fiberglass filter.
  - all spray equipment must be HVLP, electrostatic or equivalent (with written approval)
  - gun cleaning with non-HAP or fully enclosed.

# EPA's New Surface Coating Regulations

## §63.11173 What are the general requirements for Paint Strippers?

Paint strippers who use less than 150 gals/yr of a stripper containing MECL

- Must put in place management practices below, as applicable:
  - evaluate need to strip
  - evaluate alternatives
  - reduce exposure to air
  - optimize application conditions
  - proper storage & disposal

# EPA's New Surface Coating Regulations

## **§63.11173 What are the general requirements for Paint Stripper?**

Paint strippers using more than 150 gals/yr of a stripper containing MECL

- must develop & implement and submit a written MeCl minimization plan
- post a sign in each stripping area outlining the plan
- keep annual usage of MeCl-containing strippers onsite at all times
- must keep MeCl minimization plan onsite at all times

# Resources

[www.deq.virginia.gov](http://www.deq.virginia.gov)

[www.deq.virginia.gov/osba](http://www.deq.virginia.gov/osba)

Any questions?

Contact:

John McKie

Self-Certification Program Manager

(703) 583-3831

Or

Richard Rasmussen

Small Business Assistance Program

(804) 698-4394 or (800) 592-5482 ext.4394



# The Virginia Auto Body Shop Self-Certification Program

Environmental Awareness for  
Air, Water, Waste

It is Your Responsibility

# Wrap-Up

- Self-Certification Program – Questions - Comments  
call

John McKie @ 703-583-3831

or

Richard Rasmussen @ 800-592-5482 ext. 4394

- Evaluation Forms !